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Attorneys for Defendant-in-Intervention

EVEREST NATIONAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

ASSOCIATION OF CALIFORNIA
WATER AGENCIES JOINT
POWERS INSURANCE
AUTHORITY, et al.,

Plaintiffs,

vs.

THE INSURANCE COMPANY OF
THE STATE OF PENNSYLVANIA,
et al.,

Defendants.

AND RELATED THIRD-PARTY
COMPLAINTS.

CASE NO: 8:11-CV-01124-CJC (RNBx)

Judge: Hon. Cormac J. Carney

**STIPULATION RE: DISMISSAL
WITH PREJUDICE**

1 Plaintiffs-in-Intervention and Defendant-in-Intervention Everest National
2 Insurance Company (“the parties”) respectfully make this joint request that this
3 action be dismissed with prejudice.

4 **RECITALS**

5 **WHEREAS**, the remaining defendant in this action, Everest National Insurance
6 Company, has settled the case with all Plaintiffs-in-Intervention;

7 **WHEREAS**, releases have been fully executed and the settlement funds have been paid;

8 **WHEREAS**, on March 31, 2015, the Court ordered the action dismissed **without**
9 prejudice and ordered all proceedings in the case vacated and taken off calendar [Document No.
10 475];

11 **WHEREAS**, the settlement agreement calls for the action to be dismissed **with** prejudice;

12 **NOW, THEREFORE**, the parties jointly request that the Court execute the attached
13 Order dismissing the action with prejudice.

14 DATED: April 20, 2015

CROWELL & MORING LLP

16 By: /s/ Mark D. Plevin
17 Mark D. Plevin
18 Attorneys for Defendant-in-Intervention
EVEREST NATIONAL INSURANCE
COMPANY

19 DATED: April 20, 2015

ENGSTROM LIPSCOMB & LACK

21 By: /s/ Robert J. Wolfe
22 Walter J. Lack
23 Robert J. Wolfe
24 Robert Bryson
25 Attorneys for Plaintiffs-in-Intervention
FATIMA ITANI & MOHAMAD ITANI;
26 MORTEZA KHALILI & SOROUR
KHALILI; SHANNON LEW; MICHAEL
MINNICK & KATHY MINNICK; DAVID
RAMOCINSKI; AMEET SAMBRAY;

27 _____
28 ¹ Pursuant to Local Rule 5–4.3.4(a)(2)(i), Mark D. Plevin, the filer of this
stipulation, attests that all other signatories listed here, and on whose behalf the filing is
submitted, concur in the filing’s content and have authorized the filing.

1 ROBERT SHORT & KATHERINE
2 SHORT

3 DATED: April 20, 2015

LAW OFFICES OF GERALDINE LY

4 By: /s/ Geraldine Ly
5 Geraldine Ly
6 Attorneys for Plaintiffs-in-Intervention
PAUL JOHNSON AND GILLIAN
JOHNSON

7 DATED: April 20, 2015

TRAUT LAW FIRM

8
9 By: /s/ Eric V. Traut
10 Eric V. Traut
11 Attorneys for Plaintiffs-in-Intervention
PAUL JOHNSON AND GILLIAN
12 JOHNSON

13 DATED: April 20, 2015

LAW OFFICES OF RICHARD A. JONES

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15 By: /s/ Richard A. Jones
16 Richard A. Jones
Attorneys for Plaintiffs-in-Intervention
DAVID WEISS AND ALECIA WEISS

17 DATED: April 20, 2015

MORRIS POLICH & PURDY LLP

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19 By: /s/ Gary A. Hamblet
20 Gary A. Hamblet
21 Attorneys for Plaintiffs-in-Intervention
DAVID RAMOCINSKI

22 DATED: April 20, 2015

BERGER KAHN

23
24 By: /s/ David B. Ezra
25 David B. Ezra
26 Attorneys for Plaintiffs-in-Intervention
FIRE INSURANCE EXCHANGE and
27 MID-CENTURY INSURANCE
COMPANY
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